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June 16, 2021

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**RE: Colborn v. Netflix, et al.**

Dear Counsel,

Enclosed please find Plaintiff's Third Request for Production of Documents to Defendants.

Pursuant to local practice, I am maintaining the original in my file.

Sincerely,

**SCHOTT, BUBLITZ & ENGEL SC**

April Rockstead Barker

Enclosure



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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ANDREW L. COLBORN,

Plaintiff

NETFLIX, INC., et al.,

Defendants.

Case No. 19-CV-484

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**PLAINTIFF'S THIRD SET OF REQUESTS FOR PRODUCTION  
OF DOCUMENTS TO DEFENDANTS**

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Pursuant to Fed.R.Civ.P. 34, the Plaintiff requests Defendants to produce and permit inspection and copying of the documents listed in this request within 30 days of service of this request.

**DEFINITIONS**

For purposes of these requests, the following definitions apply:

1. "Any" means one or more.
2. "Communication" means any disclosure, transfer, or exchange of information or opinion, however made.
3. "Document" means any written, recorded, or graphic material of any kind, whether prepared by you or by any other person, that is in your possession, custody, or control.

The term includes, but is not limited to, agreements; contracts; letters; inter-office communications; memoranda; reports; records; instructions; specifications; notes; notebooks; scrapbooks; diaries; plans; drawings; photographs; photocopies; charts; graphs; descriptions; drafts; records of meetings, conferences, and telephone or other conversations or communications; invoices; purchase orders; recordings; published or unpublished speeches or articles; publications; transcripts of conversations; scripts;

electronic mail; text messages; chat messages; microfilm; microfiche; tape or disc recordings and computer print-outs. The term “document” also includes electronically stored data from which information can be obtained either directly or by translation through detection devices or readers; any such document is to be produced in a reasonably legible and usable form.

The term “document” includes all drafts of a document and all copies that differ in any respect from the original, including any notation, underlining, marking, or information not on the original. The term also includes information retrieval systems (including any computer archives or back-up systems), together with instructions and all other materials necessary to use or interpret such data compilations.

Without limitation on the term “control” as used in this paragraph, a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another.

#### DOCUMENTS REQUESTED

1. All documents regarding Netflix’s licensing and distribution of *Making a Murderer*.
2. All documents regarding Netflix’s participation in the editing and preparation of *Making a Murderer*.
3. All communications between Netflix employees and other individuals or entities who were involved in any way in the production of *Making a Murderer* and that were made prior to the public release of *Making a Murderer*.

Dated this 16<sup>th</sup> day of June, 2021.

  
By: \_\_\_\_\_

April Rockstead Barker  
Attorneys for Plaintiff, Andrew L. Colborn

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